

M-10-1038

JAP:ALC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

VINCENT SALAZAR, JR.,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

KYLER HARDIN, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Immigration and Customs Enforcement, duly appointed according to law and acting as such.

Upon information and belief, on or about September 9, 2010, within the Eastern District of New York and elsewhere, defendant VINCENT SALAZAR, JR. did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about September 9, 2010, VINCENT SALAZAR, JR. arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard Jet Blue Flight 822 from the Dominican Republic.

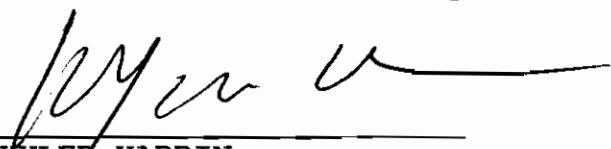
2. Defendant VINCENT SALAZAR, JR. was selected for a Customs and Border Protection ("CBP") examination. The defendant presented for inspection one brown "Charley Sport" suitcase and a black duffel bag. The defendant answered in the affirmative when asked if the luggage and all of its contents belonged to him.

3. During the subsequent inspection of his luggage, a CBP officer observed a computer bag inside the defendant's suitcase. During a search of the computer bag, CBP officers noticed that the bag felt unusually heavy. Further inspection of the bag revealed masses in the lining of the bag. CBP officers cut the lining and discovered a black package, which contained a substance that field-tested positive for the presence of cocaine.

4. The total approximate gross weight of the cocaine found in defendant VINCENT SALAZAR, JR.'s suitcase is 2,713.2 grams.

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that
defendant VINCENT SALAZAR, JR. be dealt with according to law.



KYLE HARDIN
Special Agent
U.S. Department of Homeland Security
Immigration and Customs Enforcement

Sworn to before me this
10th day of September, 2010